

Subject	Idaho Commission on Aging Policy for Reallocation of Funds Between AAAs		No.	26.02.PO
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Acronyms:

AAA – Area Agency on Aging
 ACL – Administration for Community Living
 CFR – Code of Federal Regulation
 ICOA – Idaho Commission on Aging
 IFF – Interstate Funding Formula
 OAA – Older Americans Act
 PSA – Planning and Service Areas
 SUA – State Unit on Aging

Purpose:

This policy establishes procedures for the reallocation, voluntary return of Area Agencies on Aging (AAA) funding distribution in accordance with Code of Federal Regulation (CFR) 45 Part 1321.49(e)(6).

Scope:

This policy applies to the Idaho Commission on Aging (ICOA) as the State Unit on Aging (SUA) responsible for the administration of programs under the Older Americans Act (OAA) and the planning and service areas (PSA) designated AAAs receiving funding through the Interstate Funding Formula (IFF).

Policy Statement:

In accordance with the OAA, the ICOA develops and allocates Title III funding to each PSA for supportive services, nutrition services, evidence-based disease prevention and health-promotion programs, and family caregiver services. ICOA may allocate funds when an AAA voluntarily returns funds or otherwise makes them available for allocation.

Definitions:

- **Reallocation** – Refers to the additional funds provided to an AAA when existing funding is reallocated in accordance with an IFF, resulting in a revised distribution of available funds.
- **Reallotment** – Refers to which an AAA returns funds, regardless of whether the return is voluntary or mandated.

Procedures:

1. Funding Utilization

- AAAs are expected to fully expend their allocated OAA awards to meet the needs identified within the Area Plan effectively and efficiently within designated timeframes.
- ICOA is responsible for ensuring that funding is used to fully meet the needs of older Idahoans, utilizing available resources as appropriate. ICOA will monitor AAA's progress in expending federal funding. The ICOA will provide technical guidance/assistance to AAAs to help ensure funding is obligated and spent.
- The Administration for Community Living (ACL) requires Title III awards to be fully spent. Federal regulations require ICOA to provide notice to ACL if funds are not spent annually. Funds reallocated back to ACL from Idaho are reallocated to other states.

2. AAA Voluntary Reallotment

- Annually, the ICOA will request AAAs to complete a Reallotment Form to specify:
 - Funds they wish to voluntarily return (reallotment); or
 - If the AAA does not have funding to return, whether they wish to request available reallocated funding; or
 - Whether they decline to receive any available reallocated funding.
- If the AAA voluntarily returns funds, their parent governing board chair or chief elected official may sign the Reallotment Form or submit an acknowledgement of the returned funding on official letterhead with a signature.
- ICOA encourages the AAAs to discuss funding utilization prior to completing the Reallotment Form to ensure funds are used effectively for the benefit of older Idahoans.

3. State Reallocation

- The ICOA will redistribute available funding as follows:

- i. Funds that are voluntarily reallocated or otherwise returned by an AAA will be made available for reallocation to AAAs that requested any available reallocated funds under Section 2.a.
 - ii. The IFF will be proportionally adjusted based on the Reallotment Forms to include only those AAAs that opted to request available funding.
- b. AAAs must accept all Title III funding through the voluntary reallocation process using the IFF. However, AAAs may provide a Grant Award preference and work together to ensure funds are utilized to the benefit of older Idahoans.
- c. The redistribution of voluntarily reallocated funding will occur annually and in conjunction with the Reallotment form as specified in Section 2.
- d. The reallocation of funds that are otherwise returned will occur as deemed necessary by ICOA when and if funds are returned.
 - i. If funds are returned at the end of the designated timeframe, ICOA may reallocate them to allowable expenditures, consistent with Section 3.a., to ensure full expenditure of grant funds.

4. Conditions of Reallocation when an AAA Returns and Requests Funds

- a. An AAA that returns funds to one funding section may still receive reallocated funds in a different section, provided the returned and requested funds are from different Grant Awards.
- b. Returned funds cannot be reallocated back to the same AAA within the same funding section during the same allocation period.
- c. ICOA will maintain all required documentation to ensure compliance with federal requirements.
- d. If only one AAA opts to receive funds during a reallocation cycle, that AAA may receive the full amount of available reallocated funds.